



Control Number: 51415



Item Number: 429

Addendum StartPage: 0

SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415

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APPLICATION OF SOUTHWESTERN §
ELECTRIC POWER COMPANY FOR §
AUTHORITY TO CHANGE RATES §
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS


**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
ADVOCATING REASONABLE DEREGULATION'S THIRTEENTH SET OF
REQUESTS FOR INFORMATION**

APRIL 30, 2021

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Files provided electronically on the PUC Interchange

 CARD 13-1 Attachment 1- D'Ascendis Rebuttal F

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Question No. 13-1:

Please provide a copy of Mr. D'Ascendis testimony in Word.

Response No. 13-1:

See CARD 13-1 Attachment 1 provided electronically on the PUC Interchange.

Prepared By: Stacy L. Bankston

Title: Regulatory Case Mgr

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

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Question No. 13-2:

Please provide copies of Schedules DWD-1R through DWD-17R in Microsoft Excel. Please include keep all data formulas embedded in the worksheet.

Response No. 13-2:

See the workpapers (excel file "SWEPCO ROE Rebuttal Exhibit") to Mr. D'Ascendis' rebuttal testimony filed electronically on the PUC Interchange on April 26, 2021.

Prepared By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

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Question No. 13-3:

Please provide copies of the source documents, data and work papers associated with the development of Schedules DWD-1R through DWD-17R. Please provide the underlying data and Exhibits in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.

Response No. 13-3:

See the workpapers to Mr. D'Ascendis' rebuttal testimony filed electronically on the PUC Interchange on April 26, 2021.

Prepared By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

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Question No. 13-4:

Please provide copies of all articles, publications, regulatory decisions, references, and/or documents cited in the testimony and/or footnotes. If the reference is a book, please provide a copy of the relevant section of the book.

Response No. 13-4:

See the workpapers to Mr. D'Ascendis' rebuttal testimony filed electronically on the PUC Interchange on April 26, 2021.

Prepared By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

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Question No. 13-5:

Please provide: (1) copies of the source documents, data and work papers associated with the development of Charts 1-13; and (2) the data and work papers in both paper and electronic (Microsoft Excel Worksheet) forms. For the Microsoft Excel version, please include keep all formulas embedded in the worksheet.

Response No. 13-5:

See the workpapers to Mr. D'Ascendis' rebuttal testimony filed electronically on the PUC Interchange on April 26, 2021.

Prepared By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

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Question No. 13-6:

Please provide copies of all credit reports by S&P and Moody's on SWEPCO and AEP in 2021.

Response No. 13-6:

See CARD 13-6 Confidential Attachments 1 through 3 for all S&P and Moody's reports issued on AEP and/or SWEPCO in 2021. Note: Moody's has not yet issued a report on SWEPCO in 2021.

The attachments responsive to this request are CONFIDENTIAL under the terms of the Protective Order. Due to current restrictions associated with COVID-19, this information is being provided electronically and a secure login to access the information will be provided upon request to individuals who have signed the Protective Order Certification.

Prepared By: Carrie M. Luedtke

Title: Corp Finance Analyst Prin

Sponsored By: Renee V. Hawkins

Title: Mng Dir Corporate Finance

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**SOUTHWESTERN ELECTRIC POWER COMPANY'S RESPONSE TO CITIES
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Question No. 13-7:

Please provide a list of all regulatory commission proceedings in which Mr. D'Ascendis testified on rate of return issues in the past five years (2016-21), including the date, docket number, state, utility, for each proceeding as well as the return on equity recommended by Mr. D'Ascendis and the return on equity that was ultimately adopted by the regulatory commission.

Response No. 13-7:

Please see CARD 13-7 Attachment A.

Prepared By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsored By: Dylan D'Ascendis

Title: Director, ScottMadden, Inc.

Sponsor	Date	Case/Applicant	Docket	Subject	Final Recommended ROE (%)	Recommended ROE Range (%)	Ordered ROE (%)	Settled Vs. Fully Litigated
Regulatory Commission of Alaska								
Alaska Power Company	09/20	Alaska Power Company	Docket No TA886-2	Rate of Return	12.67		Ongoing	Ongoing
Alaska Power Company	09/20	Goat Lake Hydro, Inc. & BBL Hydro, Inc.	Docket No TA6-521 Docket No. TA4-573	Rate of Return	12.66		Ongoing	Ongoing
Alaska Power Company	07/16	Alaska Power Company	Docket No TA857-2	Rate of Return	14.20		10.95	Settled
Arizona Corporation Commission								
EPCOR Water Arizona, Inc	06/20	EPCOR Water Arizona, Inc.	WS-01303A-20-0177	Rate of Return	10.24		Ongoing	Ongoing
Arizona Water Company	12/19	Arizona Water Company – Western Group	Docket No. W01445A-19-0278	Rate of Return	10.15		9.00	Litigated
Arizona Water Company	08/18	Arizona Water Company – Northern Group	Docket No W01445A-18-0164	Rate of Return	Not Specified	10.55-11.15	9.33	Litigated
Colorado Public Utilities Commission								
Summit Utilities, Inc	04/18	Colorado Natural Gas Company	Docket No 18AL-0305G	Rate of Return	Not Specified	11.75-11.90	10.30	Settled
Atmos Energy Corporation	10/17	Atmos Energy Corporation	Docket No 17AL-0429G	Rate of Return	10.50		9.45	Litigated
Delaware Public Service Commission								
Delmarva Power & Light Company	11/20	Delmarva Power & Light Company	Docket No 20-0149 (Electric)	Return on Equity	10.30	10.10-10.60	Ongoing	Ongoing
Delmarva Power & Light Company	10/20	Delmarva Power & Light Company	Docket No. 20-0150 (Gas)	Return on Equity	10.30	10.10-10.60	9.60	Settled
Public Service Commission of the District of Columbia								
Washington Gas Light Company	09/20	Washington Gas Light Company	Formal Case No 1162	Rate of Return	10.40	10.00-10.75	9.25	Settled
Federal Energy Regulatory Commission								
LS Power Grid California, LLC	10/20	LS Power Grid California, LLC	Docket No ER21-195-000	Rate of Return	10.82	9.36-12.28	Ongoing	Ongoing
Florida Public Service Commission								
Tampa Electric Company	04/21	Tampa Electric Company	Docket No 20210034-EI	Return on Equity	10.75	10.30-11.30	Ongoing	Ongoing
Peoples Gas System	09/20	Peoples Gas System	Docket No 20200051-GU	Rate of Return	10.75	10.00-11.00	9.90	Settled
Utilities, Inc. of Florida	06/20	Utilities, Inc. of Florida	Docket No 20200139-WS	Rate of Return	11.75		Ongoing	Ongoing
Hawaii Public Utilities Commission								
Launipoko Irrigation Co., Inc	12/20	Launipoko Irrigation Co., Inc	Docket No 2020-0217 / 2020-0089	Rate of Return	13.00	11.07-13.10	Ongoing	Ongoing
Kaupulehu Water Company	02/18	Kaupulehu Water Company	Docket No 2016-0363	Rate of Return	11.60		Ongoing	Ongoing
Illinois Commerce Commission								
Utility Services of Illinois, Inc	02/21	Utility Services of Illinois, Inc	Docket No 21-0198	Rate of Return	10.80	9.79-11.80	Ongoing	Ongoing
Ameren Illinois Company d/b/a Ameren Illinois	07/20	Ameren Illinois Company d/b/a Ameren Illinois	Docket No 20-0308	Rate of Return	10.50	10.50-11.00	9.67	Litigated
Aqua Illinois, Inc	05/17	Aqua Illinois, Inc	Docket No 17-0259	Rate of Return	10.85		9.60	Settled
Indiana Utility Regulatory Commission								
Aqua Indiana, Inc	03/16	Aqua Indiana, Inc Aboite Wastewater Division	Docket No. 44752	Rate of Return	NA	10.15 - 10.70	9.70	Settled
Kansas Corporation Commission								
Atmos Energy Corporation	07/19	Atmos Energy Corporation	Docket No 19-ATMG-525-RTS	Rate of Return	10.25		9.10	Litigated
Kentucky Public Service Commission								
Bluegrass Water Utility Operating Company	10/20	Bluegrass Water Utility Operating Company	Docket No 2020-00290	Return on Equity	11.80	11.49-12.16	Ongoing	Ongoing

Sponsor	Date	Case/Applicant	Docket	Subject	Final Recommended ROE (%)	Recommended ROE Range (%)	Ordered ROE (%)	Settled Vs. Fully Litigated
Louisiana Public Service Commission								
Southwestern Electric Power Company	12/20	Southwestern Electric Power Company	Docket No U-35441	Return on Equity	10.35	10.20-11.30	Ongoing	Ongoing
Atmos Energy Corporation	04/20	Atmos Energy Corporation	Docket No U-35535	Rate of Return	9.95		N/A	Rate of Return settled at 7.30% (capital structure not specified)
Maryland Public Service Commission								
Washington Gas Light Company	08/20	Washington Gas Light Company	Case No 9651	Rate of Return	10.45	10.20-10.70	9.70	Litigated
FirstEnergy, Inc	08/18	Potomac Edison Company	Case No 9490	Rate of Return	10.80		9.65	Litigated
Massachusetts Department of Public Utilities								
Unitil Corporation	12/19	Fitchburg Gas & Electric Co (Elec)	D P U 19-130	Rate of Return	10.50		9.70	Settled
Unitil Corporation	12/19	Fitchburg Gas & Electric Co (Gas)	D P U 19-131	Rate of Return	10.50		9.70	Settled
Missouri Public Service Commission								
Spire Missouri, Inc	12/20	Spire Missouri, Inc	Case No. GR-2021-0108	Return on Equity	9.95	9.94-12.07	Ongoing	Ongoing
Indian Hills Utility Operating Company, Inc	10/17	Indian Hills Utility Operating Company, Inc	Case No WR-2017-0259	Rate of Return	15.20		12.00	Settled
Raccoon Creek Utility Operating Company, Inc	09/16	Raccoon Creek Utility Operating Company, Inc	Case No SR-2016-0202	Rate of Return	15.75		12.15	Settled
Public Utilities Commission of Nevada								
Southwest Gas Corporation	08/20	Southwest Gas Corporation	Docket No 20-02023	Rate of Return	10.00		9.25 (Northern) 9.25 (Southern)	Litigated
New Hampshire Public Utilities Commission								
Aquanon Water Company of New Hampshire, Inc.	12/20	Aquanon Water Company of New Hampshire, Inc	Docket No DW 20-184	Rate of Return	10.25	9.09-10.87	Ongoing	Ongoing
New Jersey Board of Public Utilities								
Atlantic City Electric Company	12/20	Atlantic City Electric Company	Docket No. ER20120746	Return on Equity	10.30	10.20-11.24	Ongoing	Ongoing
FirstEnergy, Inc	02/20	Jersey Central Power & Light Co	Docket No ER20020146	Rate of Return	10.15		9.60	Settled
Aqua New Jersey, Inc	12/18	Aqua New Jersey, Inc.	Docket No WR18121351	Rate of Return	10.45		9.60	Settled
Middlesex Water Company	09/17	Middlesex Water Company	Docket No WR17101049	Rate of Return	10.70		9.60	Settled
New Mexico Public Regulation Commission								
Southwestern Public Service Company	01/21	Southwestern Public Service Company	Case No 20-00238-UT	Return on Equity	10.35	10.33-11.37	Ongoing	Ongoing
North Carolina Utilities Commission								
Piedmont Natural Gas Company	03/21	Piedmont Natural Gas Company	Docket No G-9, Sub 781	Return on Equity	10.25	9.58-12.30	Ongoing	Ongoing
Duke Energy Carolinas, LLC	07/20	Duke Energy Carolinas, LLC	Docket No E-7, Sub 1214	Rate of Return	10.50		9.60	Settled
Duke Energy Progress, LLC	07/20	Duke Energy Progress, LLC	Docket No E-2, Sub 1219	Rate of Return	10.50		9.60	Settled
Aqua North Carolina, Inc	12/19	Aqua North Carolina, Inc	Docket No W-218 Sub 526	Rate of Return	10.10		9.40	Settled
Carolina Water Service, Inc	06/19	Carolina Water Service, Inc	Docket No W-354 Sub 364	Rate of Return	10.20		9.50	Litigated
Carolina Water Service, Inc	09/18	Carolina Water Service, Inc	Docket No W-354 Sub 360	Rate of Return	Not Specified	10.80-11.20	9.75	Litigated
Aqua North Carolina, Inc	07/18	Aqua North Carolina, Inc	Docket No W-218 Sub 497	Rate of Return	10.80		9.70	Litigated
Public Utilities Commission of Ohio								
Aqua Ohio, Inc	05/16	Aqua Ohio, Inc	Docket No 16-0907-WWW-AIR	Rate of Return	Not Specified	10.25 - 10.65	9.87	Settled

Sponsor	Date	Case/Applicant	Docket	Subject	Final Recommended ROE (%)	Recommended ROE Range (%)	Ordered ROE (%)	Settled Vs. Fully Litigated
Pennsylvania Public Utility Commission								
Valley Energy, Inc	07/19	C&T Enterprises	Docket No R-2019-3008209	Rate of Return	10.60		9.73	Litigated
Wellsboro Electric Company	07/19	C&T Enterprises	Docket No. R-2019-3008208	Rate of Return	10.30		9.31	Litigated
Citizens' Electric Company of Lewisburg	07/19	C&T Enterprises	Docket No. R-2019-3008212	Rate of Return	10.30		9.54	Litigated
SUEZ Water Pennsylvania Inc	04/18	SUEZ Water Pennsylvania Inc.	Docket No R-2018-000834	Rate of Return	Not Specified	10.40-11.50	N/A	Settled
Columbia Water Company	09/17	Columbia Water Company	Docket No R-2017-2598203	Rate of Return	11.30		N/A	Settled
Veolia Energy Philadelphia, Inc	05/17	Veolia Energy Philadelphia, Inc	Docket No R-2017-2593142	Rate of Return	11.15		N/A	Settled
South Carolina Public Service Commission								
Blue Granite Water Co.	12/19	Blue Granite Water Company	Docket No 2019-290-WS	Rate of Return	Not Specified	10.20-10.70	Ongoing	Ongoing
Carolina Water Service, Inc	02/18	Carolina Water Service, Inc	Docket No 2017-292-WS	Rate of Return	Not Specified	10.45-10.95	10.50	Litigated
Tennessee Public Utility Commission								
Piedmont Natural Gas Company	07/20	Piedmont Natural Gas Company	Docket No 20-00086	Return on Equity	10.30	9.90-10.70	9.80	Settled
Public Utility Commission of Texas								
Southwestern Public Service Company	02/21	Southwestern Public Service Company	Docket No. 51802	Return on Equity	10.35	9.79-10.99	Ongoing	Ongoing
Company	10/20	Company	Docket No 51415	Rate of Return	10.35	10.32-11.43	Ongoing	Ongoing
Virginia State Corporation Commission								
Virginia Natural Gas, Inc	04/21	Virginial Natural Gas, Inc	PUR-2020-00095	Return on Equity	10.35	10.00-10.70	Ongoing	Ongoing
Massanutten Public Service Corp	12/20	Massanutten Public Service Corp	PUR-2020-00039	Return on Equity	NA		Ongoing	Ongoing
Aqua Virginia, Inc	07/20	Aqua Virginia, Inc.	PUR-2020-00106	Rate of Return	11.20		Ongoing	Ongoing
WGL Holdings, Inc	07/18	Washington Gas Light Company	PUR-2018-00080	Rate of Return	10.30		9.20	Litigated
Atmos Energy Corporation	05/18	Atmos Energy Corporation	PUR-2018-00014	Rate of Return	10.60		9.20	Litigated
Aqua Virginia, Inc	08/17	Aqua Virginia, Inc	PUE-2017-00082	Rate of Return	10.60		9.25	Settled
Canada - Alberta Utilities Commission								
Altalink, L.P., and EPCOR Distribution & Transmission, Inc.	01/20	Altalink, L.P., and EPCOR Distribution & Transmission, Inc	2021 Genenc Cost of Capital, Proceeding ID 24110	Rate of Return	Not Specified	8.75-10.50	8.50 (extended from 2018 proceeding)	Proceeding concluded by Commission